



October 5, 2015

Honorable Judge Cathy Seibel
United States District Court Judge
U.S.D.C., Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: **The Wave Studio, LLC v. Amadeus North America, Inc., et al.**
S.D.N.Y. Case No. 7:15-cv-06995

Dear Judge Seibel:

This letter is submitted on behalf of Defendant Amadeus North America, Inc. (“Amadeus”) to request a brief extension of the deadline for Amadeus to answer or otherwise respond to Plaintiff’s Complaint. Counsel for Plaintiff, The Wave Studio, LLC, has stipulated to the requested extension.

Plaintiff originally filed this action in the United States District Court for the Northern District of California (N. D. Cal. Case No. 15-cv-01364-RS). After Amadeus was served with the Complaint, Plaintiff and Amadeus stipulated to extend the time for Amadeus to respond to the Complaint on four prior occasions to enable Amadeus to evaluate the allegations in the Complaint and for the parties to continue their discussions concerning a possible stipulated transfer of the action to the Southern District of New York where other related proceedings are now pending. [Dkt. Nos. 18, 30, 34 and 38]. On September 1, 2015, the parties stipulated to, and the district court ordered, that this matter be transferred to this Court. [Dkt. No. 40]. The case was referred to Your Honor as possibly related to the following case: *The Wave Studio v. General Hotel Management Ltd., et al.*, Civil Case No. 7:13-cv-09239-CS (the “*Wave Studio v. GHM matter*”), which is currently pending in this Court. We understand that as of September 9, 2015, after the instant matter was transferred to this Court, all of the other Wave Studio cases pending in this Court have been consolidated with *Wave Studio v. GHM matter*, and this case has been stayed with respect to all defendants except for GHM.

In view of the foregoing, the Defendants in the instant matter that have been served with the Complaint, including Amadeus North America, Inc., Cathay, and Priceline.com, have asked counsel for Plaintiff if Plaintiff would stipulate to consolidate this matter with *Wave Studio v.*

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GHM matter, and to stay the case with respect to such Defendants. As of the date of this letter, counsel for Plaintiff is still evaluating Defendants' request. Because of the upcoming October 5, 2015 deadline for Amadeus to respond to the Complaint, counsel for Plaintiff has agreed to extend the deadline for Amadeus to answer or otherwise respond to the Complaint to October 26, 2015 to enable the parties to continue their discussions.

We are grateful for the Court's consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Richard A. McGuirk', followed by a long horizontal flourish.

Richard A. McGuirk
Attorney at Law

RAM:jh

cc: Nate A. Garhart, Esq. (via ECF)
Vijay K. Toke, Esq. (via ECF)
Duane H. Mathiowetz, Esq. (via ECF)
Gina M. McCreadie, Esq. (via ECF)
Robert Ahlefeld Weikert, Esq. (via ECF)
Steven M. Coyle, Esq. (via ECF)